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Attorneys for Plaintiffs  
DEEPAK CHOPRA; DEEPIKA CHOPRA; KARAN CHOPRA

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

DEEPAK CHOPRA, an individual;  
KARAN CHOPRA, his wife; and  
DEEPIKA CHOPRA, a minor child,

Plaintiffs,

v.

DUBLIN POLICE DEPARTMENT a  
municipal entity; VICTOR FOX, in his  
individual and official capacities as Chief  
of Police; WILLIAM COWENS, in his  
individual capacity; CHRISTOPHER  
SHEPARD, in his individual capacity; and  
DOES 1 through 10, in their individual  
capacities, inclusive

Defendants

Case No.

COMPLAINT FOR:

- Unlawful search and seizure (4th Amend.);
- Violation of Procedural Due Process (14th Amend.);
- Violation of Substantive Due Process (14th Amend.);
- Takings (5th Amend.)
- Retaliation (1st, 14th Amend.)
- Injunctive Relief

[42 U.S.C. § 1983]

State Claims:

- The Bane Act
- Replevin
- Abuse of Process
- Intentional Infliction of Emotional Distress

AND DEMAND FOR JURY TRIAL



6. Defendant City of Dublin is a municipal entity duly organized under California law, responsible for the policies, practices, and customs of its police department.

7. Defendant Victor Fox is and was at all relevant times the Chief of Police for the City of Dublin.

8. Defendant John White is and was at all relevant times the supervising officer of Defendants Cowens and Shepard with the Dublin Police Department, who approved and participated in the incidents below.

9. Defendant William Cowens is a Deputy with the Dublin Police Department, sued herein in his individual capacity.

10. Defendant Christopher Shepard is a Deputy with the Dublin Police Department, sued herein in his individual capacity.

11. Defendants Does 1-10 are individuals employed by the City of Dublin whose true names and capacities are currently unknown to Plaintiffs. Plaintiffs will amend this Complaint to identify these Defendants once discovered. All causes of action are alleged against all defendants.

## GENERAL ALLEGATIONS

12. On April 13, 2023, Deputies Cowens and Shepard, responding to a report of a robbery, entered Plaintiff's knife store without a warrant and without probable cause to think that Plaintiffs had done anything illegal. They conducted a warrantless search, filmed inventory, and unlawfully accessed restricted areas. Defendants confiscated much of plaintiffs' inventory, putting them out of business, and arrested Plaintiff Deepak, charging him with seven or more crimes.

13. On August 3, 2023, the Alameda County District Attorney declined to prosecute Plaintiff Deepak Chopra based on Shepard's fabricated allegations.

14. On August 11, 2023, Deputy Christopher Shepard, motivated by the charges being dropped, submitted materially false affidavits to a judge to secure a search warrant of Plaintiffs’

1 home and business. Shepard falsely described lawful knife inventory as “illegal contraband” and  
2 misrepresented legal business practices as criminal activity.

3 15. Shepard executed the August 11, 2023 search, seizing the rest of plaintiffs’  
4 inventory and his personal gun collection, 300 guns worth over a million dollars. Again arresting  
5 Deepak, intentionally charging him with bogus charges.

6 16. An independent third party firearms expert has confirmed that all of the seized  
7 inventory was lawful.

8 17. On February 5, 2024, Plaintiffs, through counsel, submitted a government claim  
9 to the City of Dublin pursuant to California Government Code § 910 et seq., arising from the  
10 events described herein.

11 18. Plaintiffs’ claim was rejected on February 27, 2024.

12 19. In retaliation for filing a claim, defendants once again charged Deepak with a  
13 slough of additional charges.

14 20. On multiple occasions after the second unlawful search, Dublin Police officers  
15 entered Plaintiff’s business without warrants and attempted to induce Deepak into selling  
16 restricted items unlawfully.

17 21. Plaintiffs are informed and believe that Defendants contacted countless media  
18 outlets — domestically and internationally — falsely claiming that Plaintiffs operated an illegal  
19 gun business with the intent to destroy Plaintiffs’ livelihood, and that they promoted internet  
20 search results specifically designed to associate Plaintiff’s name with illegal firearm activity,  
21 knowing full well that Plaintiff operated only a lawful knife store.

22 22. Despite a state court order instructing the return of seized property, Defendants  
23 have refused to return Plaintiffs’ inventory and personal gun collection.

24 23. Plaintiffs’ autistic minor child was present during the August 11, 2023 search.  
25 Defendants refused to allow the disabled child to return home for over five hours, causing the  
26 child to bang his head on the ground in distress and requiring emergency medical attention.  
27



1           34. As a direct and proximate cause of these actions, plaintiffs suffered damages,  
2 according to proof at trial.

3                                   FOURTH CAUSE OF ACTION

4                   (Violation of Fifth Amendment – 42 U.S.C. § 1983 - Takings Clause)

5           35. Plaintiffs reallege all the facts above as if fully restated hereunder.

6           36. Defendants violated Plaintiffs' Fifth Amendment rights by seizing Plaintiffs'  
7 property without just compensation.

8           37. As a direct and proximate cause of these actions, plaintiffs suffered damages,  
9 according to proof at trial.

10                                  FIFTH CAUSE OF ACTION

11           (Violation of First and Fourth Amendments – 42 U.S.C. § 1983 – Retaliation)

12           38. Plaintiffs reallege all the facts above as if fully restated hereunder.

13           39. Defendants violated Plaintiffs' First and Fourth Amendment rights by retaliating  
14 against them for filing a government claim and engaging in protected speech, culminating in  
15 unlawful searches, seizures, and arrests.

16           40. As a direct and proximate cause of these actions, plaintiffs suffered damages,  
17 according to proof at trial.

18                                  SIXTH CAUSE OF ACTION

19                   (The Bane Act - Civil Act § 52.1)

20           41. Plaintiffs reallege all the facts above as if fully restated hereunder.

21           42. California Civil Code § 52.1 (the Bane Act) prohibits any person from interfering  
22 by threats, intimidation, or coercion, or attempting to interfere by threats, intimidation, or  
23 coercion, with the exercise or enjoyment by any individual of rights secured by the Constitution  
24 or laws of the United States or of the State of California.

25           43. Defendants, including but not limited to William Cowens and Christopher Shepard,  
26 violated the Bane Act by engaging in threats, intimidation, and coercion to interfere with  
27

1 Plaintiffs' constitutional rights, including but not limited to Plaintiffs' rights under the First,  
2 Fourth, Fifth, and Fourteenth Amendments to the United States Constitution.

3 44. Defendants used threats, intimidation, and coercion by:

4 (a) submitting materially false statements to judges to secure search warrants;

5 (b) unlawfully entering Plaintiffs' home and business without lawful justification;

6 (c) seizing Plaintiffs' property unlawfully;

7 (d) publicizing false allegations to destroy Plaintiffs' reputation and business;

8 (e) retaliating against Plaintiffs for filing a government claim; and

9 (f) using police presence and repeated warrantless entries to intimidate and harass

10 Plaintiffs and coerce unlawful conduct.

11 45. Defendants' conduct was intentional, malicious, oppressive, and carried out with  
12 reckless disregard for Plaintiffs' rights.

13 46. As a direct and proximate result of Defendants' violations of the Bane Act,  
14 Plaintiffs have suffered economic loss, emotional distress, humiliation, reputational damage,  
15 medical expenses, and other damages in an amount to be proven at trial.

16 47. Pursuant to California Civil Code sections 52.1 and 52, Plaintiffs are entitled to  
17 compensatory damages, statutory damages, punitive damages, attorney's fees, and costs.

18 SEVENTH CAUSE OF ACTION

19 (Intentional Infliction of Emotional Distress)

20 48. Plaintiffs reallege all the facts above as if fully restated hereunder.

21 49. Defendants engaged in outrageous and extreme conduct, including repeated  
22 unlawful searches, seizures, public dissemination of false allegations, harassment of a severely  
23 autistic child, and the willful infliction of emotional distress on Plaintiffs.

24 50. Defendants' conduct was intentional, malicious, and carried out with reckless  
25 disregard for Plaintiffs' emotional well-being.

1           51. As a direct and proximate result of Defendants' conduct, Plaintiffs suffered severe  
2 emotional distress, requiring medical treatment, including hospitalization of Mrs. Chopra and  
3 medical treatment for their autistic child Karan.

4           52. Plaintiffs are entitled to compensatory and punitive damages in an amount to be  
5 determined at trial.

6                                   EIGHTH CAUSE OF ACTION

7   (Replevin)

8           53. Plaintiffs reallege all the facts above as if fully restated hereunder.

9           54. Plaintiffs are the rightful owners of personal property, including inventory valued  
10 at approximately \$2,000,000, wrongfully seized and currently retained by Defendants without  
11 consent or lawful justification.

12           55. Plaintiffs have demanded return of their property, but Defendants have failed and  
13 refused to return it.

14           56. Plaintiffs are entitled to the immediate possession of their property and seek an  
15 order compelling Defendants to return all property unlawfully seized, or, in the alternative, for  
16 judgment in the value of said property.

17                                   NINTH CAUSE OF ACTION

18   (Abuse of Process)

19           57. Plaintiffs reallege all the facts above as if fully restated hereunder.

20           58. Defendants, particularly Christopher Shepard and William Cowens, engaged in  
21 the willful misuse of legal process by securing search warrants through materially false  
22 statements and using those warrants not for legitimate investigation but to harass, intimidate, and  
23 damage Plaintiffs' business and reputation.

24           59. Defendants' actions constituted abuse of process because the legal proceedings  
25 were used for purposes wholly outside their intended function — including retaliating against  
26 Plaintiffs, destroying their business, and generating publicity to smear their name.



60. As a direct and proximate result of Defendants' conduct, Plaintiffs suffered economic loss, reputational harm, emotional distress, and other damages in an amount to be proven at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment in their favor and against all Defendants, and award:

- (i) Compensatory damages in an amount to be determined at trial;
- (ii) Punitive damages against the individual Defendants in an amount to be determined at trial;
- (iii) An Order requiring Defendants to return all property, inventory, and items seized from Plaintiffs without lawful justification;
- (iv) A permanent injunction prohibiting Defendants, including all agents of the Dublin Police Department, from entering Plaintiffs' business premises without a valid warrant and from engaging in conduct designed to induce unlawful sales or otherwise harass Plaintiffs;
- (v) Attorney's fees and costs pursuant to 42 U.S.C. § 1988;
- (vi) Pre-judgment and post-judgment interest as allowed by law;
- (vii) Such other and further relief as the Court deems just and proper.

Respectfully Submitted,  
LAW OFFICES OF JOSEPH SALAMA

Dated: April 11, 2025

/s/  
JOSEPH SALAMA  
Attorneys for Plaintiffs  
DEEPAK CHOPRA; DEEPIKA CHOPRA;  
KARAN CHOPRA

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a jury trial.

Respectfully Submitted,  
LAW OFFICES OF JOSEPH SALAMA

Dated: April 11, 2025

/s/\_\_\_\_\_  
JOSEPH SALAMA  
Attorneys for Plaintiffs  
DEEPAK CHOPRA; DEEPIKA CHOPRA;  
KARAN CHOPRA